

Requirements for Meal Modifications in the Child and Adult Care Food Program (CACFP)

Adult Day Care Centers



Connecticut State Department of Education
Bureau of Health/Nutrition, Family Services and Adult Education
Child Nutrition Programs

About this Presentation

This presentation
provides general
guidance regarding the
requirements for meal
modifications in CACFP
adult day care centers



About this Presentation

For specific questions
or technical assistance,
please contact the
Connecticut State
Department of
Education (CSDE)



<https://portal.ct.gov/SDE/Nutrition/CACFP-Contact>

Objectives

- **Review federal laws and requirements for meal modifications**
- **Identify requirements for medical statement**
- **Identify CACFP responsibilities for reasonable meal modifications**
- **Identify four actions to maintain safe eating environments for participants with food allergies**

Acronyms

ADA	Americans with Disabilities Act
CACFP	Child and Adult Care Food Program
CSDE	Connecticut State Department of Education
ECP	Emergency Care Plan
FALCPA	Food Allergen Labeling and Consumer Protection Act of 2004
FASTER	Food Allergy Safety, Treatment, Education and Research Act of 2021
HIPAA	Health Insurance Portability and Accountability Act of 1996
IHCP	Individualized Health Care Plan
USDA	U.S. Department of Agriculture

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Overview of Federal Nondiscrimination Legislation



Federal Nondiscrimination Legislation

- Section 504 of the Rehabilitation Act of 1973
- Americans with Disabilities Act (ADA) of 1990, as amended (ADA Amendments Act of 2008)
- USDA Nondiscrimination Regulations (7 CFR 15b)



Section 504 of the Rehabilitation Act of 1973 (Public Law 93-112)

- Prohibits discrimination on the basis of disability in any federal government program that receives *federal financial assistance*



<https://www.hhs.gov/sites/default/files/knowyourrights504adafactsheet.pdf>

The Americans with Disabilities Act of 1990 (ADA), As Amended

- Prohibits discrimination based on disability in the provision of state and local government services
 - **Title III:** Private entities offering public accommodations including *adult day care centers*

<https://www.ada.gov/index.html>

ADA Amendments Act

- *Expanded* and *clarified* definition of disability
 - Viewed more broadly
 - Encompasses more impairments that limit a major life activity and require an accommodation
- Clarifies that emphasis is on *providing a reasonable modification*, not on disabled person having to “prove” their disability

<https://www.ada.gov/index.html>

Comparison of Federal Nondiscrimination Laws

Criteria	Section 504	ADA Amendments Act
Participant has a disability	Yes	Yes *
Meal modifications required	Yes	Yes *

* If participant's medical condition meets the definition of disability under the ADA Amendments Act

Comparison of Federal Nondiscrimination Laws

Criteria	Section 504	ADA Amendments Act
Plan on file	<ul style="list-style-type: none">• Individualized Health Care Plan (IHCP) and/or Section 504 Plan• May also have Emergency Care Plan (ECP)	<ul style="list-style-type: none">• IHCP• May also have ECP

Comparison of Federal Nondiscrimination Laws

Criteria	Section 504	ADA Amendments Act
Required documentation for meal modification	Medical statement signed by recognized medical authority *	Medical statement signed by recognized medical authority
* Or IHCP/Section 504 plan containing required information		

CSDE Resource

Summary of Requirements for Accommodating Special Diets for Adult Participants in the CACFP

Summary of Requirements for Accommodating Special Diets for Adult Participants in the Child and Adult Care Food Program (CACFP)

This document summarizes the requirements for meal modifications for adult participants in adult day care centers that participate in the U.S. Department of Agriculture (USDA) CACFP. The USDA's regulations require reasonable modifications for adult participants whose disability restricts their diet, based on a written medical statement signed by a recognized medical authority.

Under the [Americans with Disabilities \(ADA\) Amendment Act of 2008](#), most physical and mental impairments will constitute a disability. This includes conditions that impair immune, digestive, neurological, and bowel functions, as well as many others. A physical or mental impairment does not need to be life threatening to constitute a disability. It is sufficient that it limits a major life activity. For example, an adult participant whose digestion is impaired by a food intolerance (such as lactose intolerance or gluten intolerance) may be a person with a disability, regardless of whether consuming the food causes the adult participant severe distress. All disability considerations must be reviewed on a case-by-case basis, i.e., specific to the individual medical condition and dietary needs of each adult participant.

CACFP adult day care centers may choose to make optional modifications (within the CACFP adult meal patterns) for adult participants whose dietary restrictions do not constitute a disability. Examples of optional modifications include requests related to religious or moral convictions, general health concerns, and personal food preferences, such as adult participants who prefer eating a gluten-free diet or organic foods because they believe it is better for their health. For information on the requirements for meal modifications, refer to the Connecticut State Department of Education's (CSDE) guide, [Accommodating Special Diets in CACFP Adult Day Care Centers](#), and visit the CSDE's [Special Diets in CACFP Adult Day Care Centers](#) webpage.

Scenario	Determination of disability	Plan on file	Examples of medical conditions ¹	Modification required?	Required documentation	What medical statement must include
Adult participant is determined to have a disability (physical or mental impairment) under Section 504, and the disability restricts the adult participant's diet	Recognized medical authority ¹	<ul style="list-style-type: none"> Individualized Health Care Plan (IHCP) and/or Section 504 Plan May also have an Emergency Care Plan (ECP) depending on adult participant's medical condition 	Medical conditions that substantially limit a major life activity and affect the adult participant's diet, for example: <ul style="list-style-type: none"> metabolic diseases, such as diabetes or phenylketonuria (PKU) food anaphylaxis (life-threatening food allergy) 	Yes	Medical statement signed by recognized medical authority ²	<ul style="list-style-type: none"> Information about how the adult participant's physical or mental impairment restricts the adult participant's diet An explanation of what must be done to accommodate the adult participant The food or foods to be omitted and recommended alternatives, if appropriate

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https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/SpecDiet/Summary_Chart_Special_Diets_CACFP_Adults.pdf

Disability Definition





Disability Definition (ADA)

- A *physical or mental impairment* that *substantially limits* one or more *major life activities* **OR**
- A *record* of such an impairment **OR**
- Being *regarded* as having such an impairment



Disability Definition (ADA)

- **Revises “substantially limits”**
 - **Not required to prevent or severely or significantly restrict a major life activity**
 - **Individualized assessment**
 - **Disregards ameliorative effects of mitigating measures**
 - **Episodic or in remission**



- Includes more “major life activities”

Disability Definition (ADA)

ADA Amendments Act

Expanded Definition of Disability

Major life activities

- Caring for one's self
- Performing manual tasks
- Seeing
- Hearing
- *Eating*
- Sleeping
- Walking
- Standing
- Lifting
- Bending
- Speaking
- Breathing
- Learning
- Reading
- Concentrating
- Thinking
- Communicating
- Working



New category

Major bodily functions

- *Immune system*
- Normal cell growth
- *Digestive*
- *Bowel*
- *Bladder*
- Neurological
- Brain
- Respiratory
- Circulatory
- Endocrine
- Reproductive

Cannot Consider Mitigating Measures

- Mitigating measures *eliminate or reduce* the effects of an impairment
- Cannot be considered when determining if participant has a disability

Examples

- Using insulin to control diabetes
- Using medication to control a food allergy

Disabilities include

conditions that are not life threatening or severe

- Could be a disability even if condition does *not* prevent or severely/significantly restrict a major life activity
 - Individualized assessment

Example: A participant whose digestion is impaired by a food intolerance may have a disability, even if consuming the food does not cause the participant severe distress

Disabilities include

episodic disabilities

- Impairment is episodic or in remission but substantially limits a major life activity *when active*

Examples

- Mental illness
- Multiple sclerosis
- Crohn's colitis
- Some forms of cancer

**Disabilities
may include
temporary
disabilities**

- Must consider *duration (or expected duration)* and extent to which impairment limits a major life activity

Example: A participant is on medication that requires avoidance of certain foods

- Does not include *temporary illness/injury* e.g., colds, flu, minor broken bone

What Constitutes a Disability

- Any physical or mental impairment that *prevents a participant from consuming USDA meals*
- Under ADA Amendments Act, *most physical and mental impairments* constitute a disability
- *Case-by-case basis* (consider each participant's individual medical condition)

Examples of Disabilities That May Require Meal Modifications *

- Autism
- Cancer
- Celiac disease
- Cerebral palsy
- Diabetes
- Food allergies (including non-life-threatening)
- Food intolerances, e.g., lactose, gluten
- Heart disease
- Metabolic disorders
- Obesity
- Phenylketonuria (PKU)
- Seizure disorder
- Certain temporary disabilities

* Not all-inclusive and might not require meal modifications for all participants (case-by-case basis)

Determination of disability is based on

- Federal nondiscrimination laws
- Recognized medical authority's *diagnosis* of participant's medical condition



Recognized Medical Authority

A state-licensed health care professional *authorized to write medical prescriptions under state law* and recognized by Connecticut State Department of Public Health

- Physicians (MD)
- Physician assistants (PA or PAC)
- Doctors of osteopathy (DO)
- Advanced practice registered nurses (APRN)

**Cannot accept medical statements
signed by any other individuals**

Disabilities do not include

- **General health concerns**
- **Personal preferences**
- **Religious or moral convictions**
- **Vegetarianism**



Knowledge Check: Is it a disability?

Scenario 1

A participant with autism is very sensitive to food textures and will only eat foods with a smooth texture. The participant's guardian provides a medical statement signed by a licensed physician indicating that the participant requires texture modifications.

Knowledge Check: Is it a disability?

Scenario 1

A participant with autism is very sensitive to food textures and will only eat foods with a smooth texture. The participant's guardian provides a medical statement signed by a licensed physician indicating that the participant requires texture modifications.



Meal modification required

Knowledge Check: Is it a disability?

Scenario 2

A participant's condition is not listed under "categories of disease and conditions" in the ADA Amendments Act. The medical statement signed by a licensed physician indicates that the participant's impairment requires specific meal modifications.

Knowledge Check: Is it a disability?

Scenario 2

A participant's condition is not listed under "categories of disease and conditions" in the ADA Amendments Act. The medical statement signed by a licensed physician indicates that the participant's impairment requires specific meal modifications.



Meal modification required

Knowledge Check: Is it a disability?

Scenario 3

A participant believes a gluten-free diet is healthier. The medical statement signed by a licensed physician indicates that the participant does not have an impairment.

Knowledge Check: Is it a disability?

Scenario 3

A participant believes a gluten-free diet is healthier. The medical statement signed by a licensed physician indicates that the participant does not have an impairment.



**Meal modification NOT required
(no disability)**

Knowledge Check: Is it a disability?

Scenario 4

A participant has gluten intolerance. The medical statement signed by a licensed physician indicates that the gluten intolerance is an impairment for this participant and requires a gluten-free diet.

Knowledge Check: Is it a disability?

Scenario 4

A participant has gluten intolerance. The medical statement signed by a licensed physician indicates that the gluten intolerance is an impairment for this participant and requires a gluten-free diet.

Yes

Meal modification required

Knowledge Check: Is it a disability?

Scenario 5

A participant has lactose intolerance and experiences mild stomach discomfort when he eats dairy products. The medical statement signed by a licensed physician indicates that the participant's lactose intolerance is an impairment and that juice should substitute for milk.

Knowledge Check: Is it a disability?

Scenario 5

A participant has lactose intolerance and experiences mild stomach discomfort when he eats dairy products. The medical statement signed by a licensed physician indicates that the participant's lactose intolerance is an impairment and that juice should substitute for milk.

Yes

Meal modification required

Knowledge Check: Is it a disability?

Scenario 6

A participant has a non-life-threatening food allergy that results in a rash when she eats certain foods. The medical statement signed by a recognized medical authority indicates that the food allergy is an impairment for this participant and lists requested substitutions for these foods.

Knowledge Check: Is it a disability?

Scenario 6

A participant has a non-life-threatening food allergy that results in a rash when she eats certain foods. The medical statement signed by a recognized medical authority indicates that the food allergy is an impairment for this participant and lists requested substitutions for these foods.

Yes

Meal modification required

Meal Modifications for Participants with Disabilities



Overview of USDA Requirements for Participants with Disabilities

- Must provide *reasonable* meal modification
 - Related to disability or limitations caused by disability
- Based on *medical statement* (or Section 504 plan, if applicable)
- *Case-by-case basis* (specific to individual medical condition and dietary needs of each participant)

Definition of Reasonable Modification

A *change or alteration in policies, practices, and/or procedures* to accommodate a disability that ensures participants with disabilities have *equal opportunity* to participate in or benefit from a program

General guideline: Individuals with disabilities must be able to *participate in and receive benefits from* programs that are available to individuals without disabilities

Is Meal Modification Required?

- Indicated in **Question 10** of CSDE's *Medical Statement for Meal Modifications in CACFP Adult Day Care Centers*
 - **Yes** = required
 - **No** = optional (must meet CACFP meal patterns)

Section B – Completed by participant's recognized medical authority

This section must be completed by the participant's physician, physician assistant, doctor of osteopathy, or advanced practice registered nurse (APRN). APRNs include nurse practitioners, clinical nurse specialists, and certified nurse anesthetists who are licensed as APRNs.

10. **Physical or mental impairment:** Does the participant have a physical or mental impairment that restricts the participant's diet?
- No **Yes:** Describe how the participant's physical or mental impairment restricts the participant's diet.

<https://portal.ct.gov/SDE/Nutrition/Special-Diets-in-CACFP-Adult-Day-Care-Centers/Documents#MedicalStatements>

Does the participant have a physical or mental impairment that meets the definition of *disability* under any of the federal nondiscrimination laws (Section 504, the ADA and ADA Amendments Act, the IDEA, and the USDA's nondiscrimination regulations 7 CFR 15 b)?

Yes

No

Does the physical or mental impairment *restrict the participant's diet*?

Yes

No

Adult day care center is *not required* to make the meal modification

Did the participant or their guardian/caregiver provide a *medical statement* signed by a recognized medical authority (or IEP or Section 504 plan) that indicates

- how the participant's physical or mental impairment restricts the participant's diet
- an explanation of what must be done to accommodate the participant
- if appropriate, the food or foods to be omitted and recommended alternatives

Yes

No

Adult day care center is *required* to make a reasonable meal modification and must work with the participant or their guardian/caregiver to obtain a medical statement

Adult day care center is *required* to make a reasonable meal modification

Denying Meal Modification Requests is Almost Never Appropriate

Exception	Request that would fundamentally alter the nature of the CACFP
Emphasis	Collaborate with participants or their guardians/caregivers to develop effective approach to provide a reasonable meal modification for the participant

Medical Statements



Medical Statement Must Include Three Elements

1. **Information** about participant's physical or mental impairment (disability) that is sufficient to allow the adult day care center to understand how the impairment restricts the participant's diet
2. An **explanation** of what must be done to accommodate the participant's disability
3. If appropriate, the **foods to be omitted and recommended alternatives**

Key Considerations for Medical Statements

- CSDE's form recommended
- Alternate forms must include USDA's three required elements
- Cannot require specific diagnosis by name or use "disabled" or "disability"
- 504 plan with USDA's three required elements may replace medical statement

CSDE Resource

Medical Statement for Meal Modifications in CACFP Adult Day Care Centers

- English
- Spanish

Medical Statement for Meal Modifications in Child and Adult Care Food Program (CACFP) Adult Day Care Centers

This form applies to requests for meal modifications for adult participants in adult day care centers participating in the U.S. Department of Agriculture's (USDA) CACFP. CACFP adult day care centers are required to make reasonable meal modifications for participants whose physical or mental impairment restricts their diet. For guidance on meal modifications and instructions for completing this form, see the Connecticut State Department of Education's (CSDE) document, *Guidance and Instructions for the Medical Statement for Meal Modifications in CACFP Adult Day Care Centers*.

Note: The USDA requires that the medical statement includes: 1) information about the participant's physical or mental impairment that is sufficient to allow the adult day care center to understand how the impairment restricts the participant's diet; 2) an explanation of what must be done to accommodate the participant's disability; and 3) if appropriate, the food or foods to be omitted and recommended alternatives. **CACFP adult day care centers should not deny or delay a requested meal modification because the medical statement does not provide sufficient information.** When necessary, the adult day care center should work with the participant or responsible family member to obtain the required information. While obtaining additional information, the CACFP adult day care center should follow the portion of the medical statement that is clear and unambiguous to the greatest extent possible.

Section A – Completed by participant or responsible family member

1. Name of participant: _____ 2. Birth date: _____
3. Name of responsible family member (if applicable): _____
4. Phone number (with area code): _____ 5. E-mail address: _____
6. Address: _____ City: _____ State: _____ Zip: _____
7. In accordance with the provisions of the Health Insurance Portability and Accountability Act (HIPAA) of 1996 and the Family Educational Rights and Privacy Act (FERPA), I hereby authorize _____ *name of participant's recognized medical authority* to release such protected health information as is necessary for the specific purpose of special diet information to _____ *name of CACFP adult day care center* and I consent to allow the recognized medical authority to freely exchange the information listed on this form and in my records with the adult day care program as necessary. I understand that I may refuse to sign this authorization without impact on the eligibility of my request for a special diet. I understand that I may rescind permission to release this information at any time except when the information has already been released.
8. Signature of participant or responsible family member: _____ 9. Date: _____

Section B – Completed by participant's recognized medical authority

This section must be completed by the participant's physician, physician assistant, doctor of osteopathy, or advanced practice registered nurse (APRN). APRNs include nurse practitioners, clinical nurse specialists, and certified nurse anesthetists who are licensed as APRNs.

10. **Physical or mental impairment:** Does the participant have a physical or mental impairment that restricts the participant's diet?
 No Yes: Describe how the participant's physical or mental impairment restricts the participant's diet.
11. **Diet plan:** Explain the meal modification for the participant. Attach a specific diet plan, if needed.

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<https://portal.ct.gov/SDE/Nutrition/Special-Diets-in-CACFP-Adult-Day-Care-Centers/Documents#MedicalStatements>

Guidance and Instructions: Medical Statement for Meal Modifications in CACFP Adult Day Care Centers

- English
- Spanish

Guidance and Instructions for the Medical Statement for Meal Modifications in Child and Adult Care Food Program (CACFP) Adult Day Care Centers

The Connecticut State Department of Education's (CSDE) *Medical Statement for Meal Modifications in CACFP Adult Day Care Centers* applies to requests for meal modifications for adult participants in adult day care centers participating in the U.S. Department of Agriculture's (USDA) CACFP. CACFP adult day care centers:

- are **required** to make reasonable meal modifications for participants whose physical or mental impairment (disability) restricts their diet; and
- have the **option** to make meal modifications for participants whose special dietary needs do not constitute a disability, if the requested modification complies with the USDA meal patterns.

This document provides general guidance on the requirements for meal modifications (pages 1-7) and instructions for completing the CSDE's *Medical Statement for Meal Modifications in CACFP Adult Care Centers* form (pages 8-9). For detailed guidance on the requirements for modified meals, refer to the CSDE's guide, *Accommodating Special Diets in CACFP Adult Day Care Centers*.

Determining if a meal modification is required

CACFP adult day care centers can determine if an adult participant requires a meal modification by reviewing question 10 in section B of the CSDE's *Medical Statement for Meal Modifications in CACFP Adult Day Care Centers* form. Question 10 asks if the participant has a physical or mental impairment that restricts their diet. If the recognized medical authority's answer is "Yes," the CACFP adult day care center must make the meal modification. If the recognized medical authority's answer is "No," the CACFP adult day care center can choose, but is not required, to make the meal modification. For more information, refer to "What Constitutes a Disability" on page 3.

Meal Modifications for Participants with Disabilities

Federal laws and USDA regulations require that CACFP adult day care centers make reasonable meal modifications on a case-by-case basis to accommodate participants whose disability restricts their diet. A "**reasonable modification**" is a change or alteration in policies, practices, and/or procedures to accommodate a disability that ensures participants with disabilities have equal opportunity to participate in or benefit from a program.

A request for a reasonable modification must be related to the disability or limitations caused by the disability and requires a medical statement from a state-licensed healthcare professional who is authorized to write medical prescriptions under state law. The Connecticut State Department of Public Health defines a **recognized medical authority** as a physician, physician assistant, doctor of

<https://portal.ct.gov/SDE/Nutrition/Special-Diets-in-CACFP-Adult-Day-Care-Centers/Documents#MedicalStatements>

Handling Missing Information



- *Cannot deny or delay* requested meal modification when medical statement has *insufficient information*
 - Obtain appropriate clarification
 - Work with participant or their guardian/caregiver to obtain amended medical statement

Handling Missing Information

While waiting for more information

- Follow portion of medical statement that is *clear and unambiguous*
- May *claim meals*



Handling Missing Information

While waiting for more information



■ Adult day care center must

1. Document initial conversation
2. Follow up and maintain record of contact
3. Diligently continue to follow up until medical statement is received or request is rescinded

Handling Conflicting Information

- Request revised medical statement with updated information

Example: Medical statement indicates to avoid all foods containing lactose, but participant tells staff she can eat yogurt and cheese



Updates to Medical Statements

- No USDA requirements for time limits or updates
- Develop *local plan* to ensure information is current
- Changes must be in *writing*
 - Medical statement **OR**
 - Section 504 plan if applicable



Updates to Medical Statements

- USDA recommends maintaining documentation when *ending* a meal modification

Example: Ask participant or their guardian/caregiver to sign a statement or send e-mail indicating meal modification is no longer needed



Considerations for Reasonable Modifications



General Guideline for Reasonable Meal Modifications

Must offer *medically appropriate* and *reasonable* modification that effectively *accommodates* participant's disability and provides *equal opportunity* to participate in or benefit from the CACFP



Reasonable Meal Modifications

- Must be *related to participant's disability* based on medical statement
- Must assess each request on *case-by-case basis* to determine appropriate modification



Reasonable Meal Modifications

- Must serve a *safe meal* that accommodates the participant's disability
- May consider *cost and efficiency* when choosing the most appropriate approach to accommodate a participant's disability



Reasonable meal modifications do not require

same meal as regular menu



- **Must accommodate participant's disability but not required to serve the *same meal***

Example: Participant has lactose intolerance and lunch entree is macaroni and cheese

- **Adult day care center is not required to prepare macaroni with lactose-free cheese**
- **Must provide a lactose-free entree**

Reasonable meal modifications do not require

specific brands of food



- Not required to provide *exact substitution* requested in medical statement unless medically necessary

Example: Medical statement for a food allergy requests a specific brand of food as a substitute

- Not required to provide specific brand
- Must offer a substitute without participant's allergen

Reasonable meal modifications do not require

specific number of alternate meals



- Depending on participant's medical condition, a reasonable modification could be
 - the *same modified meal* that meets the participant's specific dietary needs each time they eat CACFP meals **OR**
 - a *cycle menu of modified meals* that meet the participant's specific dietary needs

Reasonable meal modifications do not require

specific number of alternate meals

- Whenever possible, USDA encourages a *variety of options over the week* similar to the variety offered in the regular CACFP menu



Best Practice: Cycle Menus

- Develop *cycle menus* of modified meals that meet specific dietary needs
 - Diabetes
 - Gluten-free
 - Specific food allergies
- Before using, check with participant or their guardian/caregiver to ensure the cycle menu meets participant's specific dietary requirements



Nutrition Information

- Must make *nutrition information* available as needed to ensure a safe meal for the participant
 - Participants
 - Guardians/caregivers
 - Medical personnel
 - Others as needed



Nutrition Information

- May provide in different ways such as
 - CACFP menus
 - Adult day care center website
 - Binder of nutrition labels available for review



Nutrition Information

- May need to *contact product's supplier or manufacturer* if label does not provide adequate nutrition information
- Communicate with participants or their guardians/caregivers and provide menus in advance



Texture Modifications

- Meals modified for texture consist only of *regular menu items*, unless otherwise specified
 - Meet CACFP meal pattern
- Medical statement not required but recommended to ensure clear communication



Chopped
Ground
Pureed

Meal Services Outside USDA Programs

- Adult day care centers are not required to provide meal services, special foods, or supplements to participants with disabilities when the *meal service is not normally available for all participants*

Example: An adult day care center that does not serve breakfast is not required to provide breakfast for participants with disabilities



Identifying Participants Who Require Meal Modifications



Health Insurance Portability and Accountability Act of 1996 (HIPAA)

- Protects personal health information
- *Permits disclosure* for patient care and other important purposes, e.g., *meal modifications*



<https://www.hhs.gov/hipaa/index.html>

Adult Day Care Center's Policies and Practices

- Must *protect privacy* of participants who have a disability
- Must *maintain confidentiality* of each participant's medical condition





Federal Laws Do NOT Allow

- *Outward identification* of participants whose disability requires a meal modification

Example: Posting lists of participants' dietary needs in public areas



Federal Laws Do NOT Allow

- Asking participants or their guardians/caregivers to *relinquish confidential medical information* through outward identification

Example: Asking participants or their guardians/caregivers to consent to a physical designation, such as wearing a lanyard, bracelet, pin, sticker, or similar item

USDA Recommended Practices



Regular Staff Updates

- Post information about participants' dietary needs in locations *visible only to applicable staff*
 - Kitchen
 - Behind counters and serving lines
 - Office

USDA Recommended Practices



Regular Staff Updates

- Conduct *daily pre-service meeting* with applicable staff * to *identify menu items* that should be avoided for certain dietary restrictions

* Food service staff and center staff supervising CACFP meals and snacks

USDA Recommended Practices

Ongoing Communication

- Let participants and their guardians/caregivers know about center's
 - menus
 - process for requesting meal modifications
 - procedures for ensuring meals meet participants' dietary needs



Forums or meetings

Center policy

Website

E-mails

Newsletters

Menu backs

Appropriate Eating Areas



Appropriate Eating Areas

- Must accommodate participants with disabilities in *least restrictive* and *most integrated* setting



Separate Tables

- May be appropriate under some circumstances **BUT**
 - Must always be based on what is *appropriate to meet participants' needs*
 - Cannot segregate for convenience



Knowledge Check for Eating Areas: Is this practice appropriate?

A participant requires a large degree of assistance from an aide in order to consume her meals. During the meal service, the participant and aide are at a *separate table* that has more space.

Knowledge Check for Eating Areas: Is this practice appropriate?

A participant requires a large degree of assistance from an aide in order to consume her meals. During the meal service, the participant and aide are at a *separate table* that has more space.



If this practice is in the *best interest* of meeting the participant's needs

Knowledge Check for Eating Areas: Is this practice appropriate?

An adult day care center designates a *separate table* where participants with severe food allergies can safely consume their meals

Knowledge Check for Eating Areas: Is this practice appropriate?

An adult day care center designates a *separate table* where participants with severe food allergies can safely consume their meals



If this practice is in the *best interest* of meeting the participants' needs

Must be cleaned according to food safety guidelines to eliminate possible cross-contact of allergens on tables and seating

Knowledge Check for Eating Areas: Is this practice appropriate?

An adult day care center designates an *area away from the dining area* where participants with severe food allergies can safely consume their meals

Knowledge Check for Eating Areas: Is this practice appropriate?

An adult day care center designates an *area away from the dining area* where participants with severe food allergies can safely consume their meals



If this practice is in the *best interest* of meeting the participants' needs

Must be cleaned according to food safety guidelines to eliminate possible cross-contact of allergens on tables and seating

Procured Meals



Food Service Contracts

- Federal regulations specifically *prohibit disability discrimination* through contracts
- Adult day care centers should address requirements for vendors to
 - make meal modifications
 - provide nutrition information



USDA Policy Memo

USDA Memo SP 40-2016, CACFP 12-2016, SFSP 14-2016

Updated Guidance: Contracting with Food Service Management



Food and Nutrition Service
Park Office Center
3101 Park Center Drive
Alexandria VA 22302

DATE: June 2, 2016
MEMO CODE: SP 40-2016, CACFP 12-2016, SFSP 14-2016
SUBJECT: Updated Guidance: Contracting with Food Service Management Companies
TO: Regional Directors
Special Nutrition Programs
All Regions
State Directors
Child Nutrition Programs
All States

Attached is the updated guidance for State agencies and school food authorities (SFA) contracting with food service management companies (FSMC). The updated guidance for State agencies includes information on appropriate procurement methods, considerations when using prototype solicitations, the process of evaluating and scoring criteria for contract award, and monitoring responsibilities. The guidance also includes contract amendments to be avoided, unacceptable contract provisions, and how to address conflicting contract terms.

The updated guidance for SFAs includes responsibilities and considerations when using an FSMC and addresses program oversight and monitoring. Additionally, this guidance discusses factors to consider when choosing procurement methods, how to develop solicitation documents, and characteristics of comprehensive agreements to include meal service and financial provisions.

New appendices include worksheets, sample instructions, and checklists designed to assist State agencies and SFAs when contracting with FSMCs. Changes and additions to the guidance have been highlighted in yellow.

State agencies are reminded to distribute this memorandum to Program operators. Program operators should direct any questions concerning this guidance to their State agency. State agencies with questions should contact the appropriate Food and Nutrition Service Regional office.

Sincerely,

Original Signed

Sarah E. Smith-Holmes
Director
Program Monitoring and Operational Support Division
Child Nutrition Programs

USDA is an Equal Opportunity

The contents of this guidance document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.

Procured Meals

- Federal regulations specifically prohibit disability discrimination through contracts
- Must make reasonable modifications for participants with disabilities, regardless of whether the CACFP adult day care center
 - operates the food service
 - contracts with a food service management company (FSMC)
 - purchases vended meals



Procedural Safeguards (7 CFR 15b.25)



Procedural Safeguards

- USDA encourages adult day care centers to implement procedures for participants or their guardians/caregivers to
 - request a reasonable meal modification
 - resolve grievances



Procedural Safeguards

- At a minimum, must *provide notice of nondiscrimination and accessible services*, as outlined in USDA's nondiscrimination regulations (7 CFR 15b.7)



Procedural Safeguards

- Adult day care centers should ensure that staff members *understand the procedures* for meal modification requests



Adult Day Care Centers Employing At Least 15 Individuals

- Must designate at least one person to *coordinate compliance with disability requirements* (often referred to as the Section 504 Coordinator)
- Must establish *grievance procedures* that incorporate appropriate due process standards and provide for prompt and equitable resolution of complaints

Grievance Procedures Should

- Allow participants or their representatives to *submit a grievance* (complaint with any supporting documentation) for consideration by the CACFP facility
- Provide that a *prompt decision* by the adult day care center be rendered to the participant or participant's representative regarding the grievance

Grievance Procedures Should

- Ensure that decision includes the *official USDA nondiscrimination statement*, which advises participants how to file a complaint with USDA's Food and Nutrition Service (FNS)
 - Available in CSDE's document, Civil Rights Requirements for the CACFP

https://portal.ct.gov/-/media/SDE/Nutrition/CivilRights/Civil_Rights_CACFP_Requirements.pdf

Adult Day Care Centers Employing Less than 15 Individuals

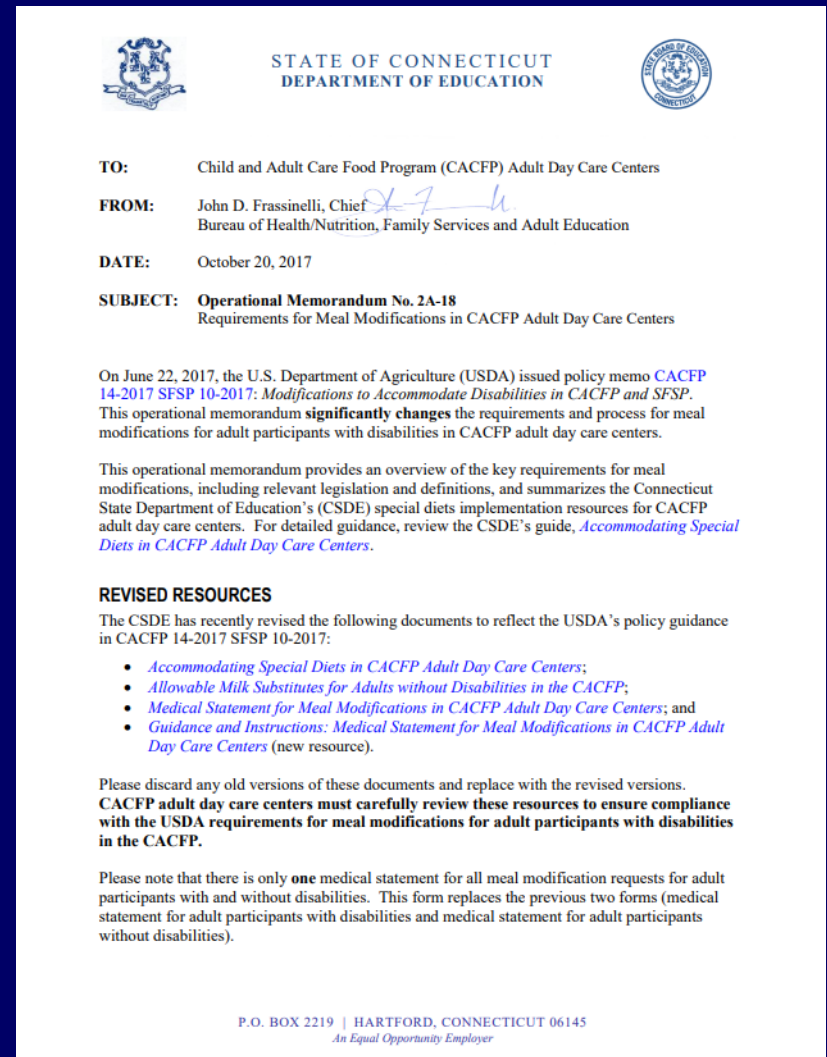
- USDA recommends having someone on staff who can provide *technical assistance* regarding meal modifications for participants with disabilities

CSDE Resource

Operational Memorandum No. 2A-18

Requirements for Meal Modifications in CACFP Adult Day Care Centers

- Procedural safeguards on page 7



<https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/Memos/OM2018/OM02A18.pdf>

Managing Food Allergies in the CACFP



Preventing Allergic Reactions

- The only way to prevent an allergic reaction is to *avoid exposure* to the allergen

Remember: Even a tiny amount of an allergen can cause a severe and potentially life-threatening reaction for some people

Terms to Know

Food allergy

An exaggerated response by the immune system to a food that the body mistakenly identifies as being harmful

Allergen

A food protein that triggers an immune response and causes an allergic reaction



Managing Food Allergies in the CACFP

- Generally considered to be a disability, even if not life-threatening or severe
 - Meal modifications are required
- Can often be accommodated within CACFP adult meal patterns

Example: If a participant has an allergy to a specific fruit or vegetable, the center may substitute another fruit or vegetable in the participant's meal



Managing Food Allergies in the CACFP

- Follow *adult day care center's procedures* for participants with life-threatening food allergies
- Follow other *applicable requirements and guidance*
 - Food service policies
 - Standard Operating Procedures (SOPs)

Food Bans

- ***Not USDA policy*** but could be appropriate depending on local circumstances
- If adult day care center enacts universal ban, the specific allergen must ***never be present in the center***
 - Participants and guardians/caregivers will assume the center is a safe place based on the stated ban



Adult Day Care Center's Overall Responsibilities for Food Allergies

1. Provide a *safe meal* and *safe environment* to consume the meal



Adult Day Care Center's Overall Responsibilities for Food Allergies

2. Ensure modified meals *meet each participant's prescribed guidelines* and are free of all ingredients suspected of causing an allergic reaction



Adult Day Care Center's Overall Responsibilities for Food Allergies

3. Use *proper storage, preparation, and cleaning techniques* to prevent exposure to allergens through cross-contact



Adult Day Care Center's Overall Responsibilities for Food Allergies

4. Make *nutrition information* available to participants, guardians/caregivers, medical professionals, and others as needed



Four Key Actions for CACFP Staff

1. Recognize participants with food allergies
2. Read food labels
3. Prevent cross-contact of possible food allergens
4. Promote communication and teamwork



Four Key Actions for CACFP Staff

1

Recognize participants

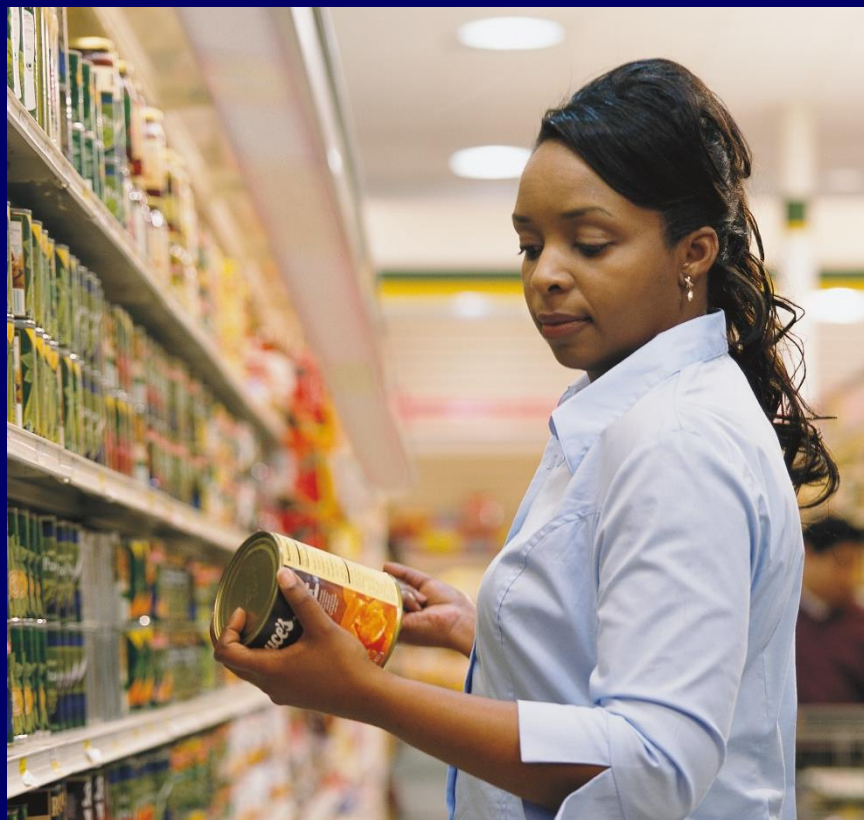
- Follow adult day care center's procedures for identifying participants with food allergies
- Get to know and recognize participants with food allergies

You are the first line of defense in ensuring safe meals for participants!

Four Key Actions for CACFP Staff

2

Read Food Labels



Know What to Avoid

- Understand *how* to read food labels
- *Read all food labels* for potential food allergens
 - Check labels *each time* a food is purchased



Know What to Avoid

- *Check* with manufacturer if unsure about an ingredient
 - Consumer hotlines
- *Maintain* food labels and recipes on file



Work with Vendors to Obtain Food Labels

- Maintain *vendor contact* information to access food label information
- *Check deliveries* to ensure correct items are received



Work with Vendors to Obtain Food Labels

- Ensure that vendors *alert food service staff* before making product substitutions
 - Read labels for all new products to check for potential allergens



Food Allergen Labeling Laws

2004: Food Allergen Labeling and Consumer Protection Act (FALCPA)

Identifies *8 major food allergens* required on food labels (milk, eggs, fish, shellfish, tree nuts, peanuts, wheat, and soybeans)

2021: Food Allergy Safety, Treatment, Education and Research (FASTER) Act

Requires that *sesame* must be labeled on packaged foods beginning *January 1, 2023*

FALCPA: <https://www.fda.gov/food/food-allergensgluten-free-guidance-documents-regulatory-information/food-allergen-labeling-and-consumer-protection-act-2004-questions-and-answers>

FASTER Act: <https://www.congress.gov/117/plaws/publ11/PLAW-117publ11.pdf>

Eight Major FALCPA Allergens + Sesame

1. Milk
2. Eggs
3. Peanuts
4. Tree nuts, e.g., almonds, cashews, pistachios, pecans, walnuts, hazelnuts
5. Wheat
6. Fish, e.g., bass, flounder, trout, cod, salmon
7. Crustacean shellfish, e.g., crab, lobster, shrimp
8. Soy
9. Sesame



Three Ways to Identify Allergens



1. In *ingredients list*, using allergen's common name

Examples

Milk, cod, shrimp, walnuts

Three Ways to Identify Allergens



2. In *ingredients list in parentheses*, when ingredient is a less common form of the allergen

Example

Ingredients: Whey protein (milk), lecithin (soy), cherry, sugar, natural flavors (almond), salt.

Three Ways to Identify Allergens



3. Using the word “contains” followed by name of allergen

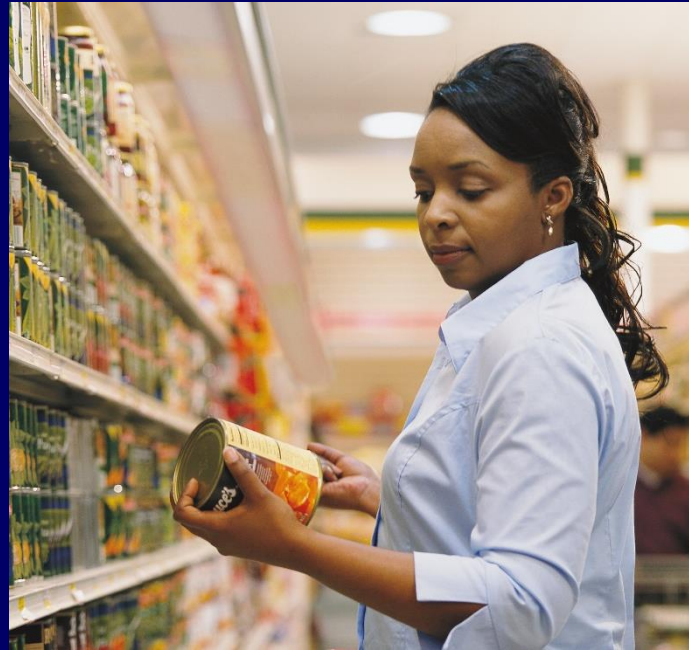
- Listed after ingredients

Example

Ingredients: Whey protein, lecithin, cherry, sugar, natural flavors, salt. *Contains: Milk, soy, and almond.*

Knowledge Check: What's in a name?

Indicate the major allergen for each ingredient



Knowledge Check: What's in a name?

Ingredient	Allergen
Albumin	

Knowledge Check: What's in a name?

Ingredient	Allergen
Albumin	egg

Knowledge Check: What's in a name?

Ingredient	Allergen
Albumin	egg
Bulgur	

Knowledge Check: What's in a name?

Ingredient	Allergen
Albumin	egg
Bulgur	wheat

Knowledge Check: What's in a name?

Ingredient	Allergen
Albumin	egg
Bulgur	wheat
Casein	

Knowledge Check: What's in a name?

Ingredient	Allergen
Albumin	egg
Bulgur	wheat
Casein	milk

Knowledge Check: What's in a name?

Ingredient	Allergen
Albumin	egg
Bulgur	wheat
Casein	milk
Peanut protein hydrolysate	

Knowledge Check: What's in a name?

Ingredient	Allergen
Albumin	egg
Bulgur	wheat
Casein	milk
Peanut protein hydrolysate	peanuts

Knowledge Check: What's in a name?

Ingredient	Allergen
Albumin	egg
Bulgur	wheat
Casein	milk
Peanut protein hydrolysate	peanuts
Textured vegetable protein	

Knowledge Check: What's in a name?

Ingredient	Allergen
Albumin	egg
Bulgur	wheat
Casein	milk
Peanut protein hydrolysate	peanuts
Textured vegetable protein	soy

Knowledge Check: What's in a name?

Ingredient	Allergen
Albumin	egg
Bulgur	wheat
Casein	milk
Peanut protein hydrolysate	peanuts
Textured vegetable protein	soy
Vitellin	

Knowledge Check: What's in a name?

Ingredient	Allergen
Albumin	egg
Bulgur	wheat
Casein	milk
Peanut protein hydrolysate	peanuts
Textured vegetable protein	soy
Vitellin	egg

Knowledge Check: What's in a name?

Ingredient	Allergen
Albumin	egg
Bulgur	wheat
Casein	milk
Peanut protein hydrolysate	peanuts
Textured vegetable protein	soy
Vitellin	egg
Whey	

Knowledge Check: What's in a name?

Ingredient	Allergen
Albumin	egg
Bulgur	wheat
Casein	milk
Peanut protein hydrolysate	peanuts
Textured vegetable protein	soy
Vitellin	egg
Whey	milk

Knowledge Check: What's in a name?

Ingredient	Allergen
Albumin	egg
Bulgur	wheat
Casein	milk
Peanut protein hydrolysate	peanuts
Textured vegetable protein	soy
Vitellin	egg
Whey	milk
Tahini	

Knowledge Check: What's in a name?

Ingredient	Allergen
Albumin	egg
Bulgur	wheat
Casein	milk
Peanut protein hydrolysate	peanuts
Textured vegetable protein	soy
Vitellin	egg
Whey	milk
Tahini	sesame

Precautionary Language on Food Labels

“May contain...”

“Processed in a facility that also processes...”

“Made on equipment with...”

- Voluntary for manufacturers
- Not regulated
- *May or may not indicate* if product unintentionally contains (or has come in contact with) a specific allergen



“___-free” Statements for the 8 Allergens

Peanut-free

Egg-free

- Phrases like “peanut-free” and “egg-free” are *not regulated*
- Always contact manufacturer if unsure

“Gluten-free” Labeling of Foods



- Different from allergen labeling
- FDA labeling requirements for voluntary use of “gluten-free”
 - 2013: Gluten-Free Labeling of Foods
 - 2020: Gluten-Free Labeling of Fermented or Hydrolyzed Foods

<https://www.federalregister.gov/documents/2013/08/05/2013-18813/food-labeling-gluten-free-labeling-of-foods>

<https://www.federalregister.gov/documents/2020/08/13/2020-17088/food-labeling-gluten-free-labeling-of-fermented-or-hydrolyzed-foods>

Natural Flavors

Spice
Fruit or fruit juice
Vegetable or vegetable juice
Edible yeast
Herb
Bark
Bud
Root
Leaf or similar plant material
Meat
Seafood
Poultry
Eggs
Dairy products

- Can hide many potential food allergens
- FALCPA requires natural flavors to list the 8 allergens
- For other allergens, check with manufacturer



Knowledge Check:

How many of the 8 major allergens?

Roasted peanuts, corn syrup, sugar, whole grain oats, dark chocolate chunks (sugar, chocolate liquor, cocoa butter, natural flavor), palm kernel oil, rice flour, almonds, whole grain wheat, fructose, cocoa, vegetable glycerin, canola oil, salt, corn starch, barley malt extract, milk, baking soda, natural flavor, mixed tocopherols added to retain freshness.

Knowledge Check:

How many of the 8 major allergens?

Roasted peanuts, corn syrup, sugar, whole grain oats, dark chocolate chunks (sugar, chocolate liquor, cocoa butter, natural flavor *), palm kernel oil, rice flour, almonds, whole grain wheat, fructose, cocoa, vegetable glycerin, canola oil, salt, corn starch, barley malt extract, milk, baking soda, natural flavor *, mixed tocopherols added to retain freshness.

4

- Peanuts
- Tree nuts
- Wheat
- Milk

* Check with manufacturer about natural flavor

Knowledge Check:

How many of the 8 major allergens?

Whole wheat flour, sugar, enriched flour (wheat flour, niacin, iron, thiamin mononitrate, riboflavin, folic acid), margarine (palm oil, butter [cream, salt], water, contains 2% or less of salt, mono & diglycerides, natural flavor, citric acid, vitamin A palmitate added, beta carotene [color]), eggs, invert sugar, water, soybean oil, contains 2% or less of: mono- and diglycerides, leavening (baking soda, sodium aluminum phosphate), salt, potassium chloride, natural and artificial flavor, turmeric and annatto (color). Contains wheat, milk, eggs, soy.

Knowledge Check:

How many of the 8 major allergens?

Whole wheat flour, sugar, enriched flour (wheat flour, niacin, iron, thiamin mononitrate, riboflavin, folic acid), margarine (palm oil, butter [cream, salt], water, contains 2% or less of salt, mono & diglycerides, natural flavor, citric acid, vitamin A palmitate added, beta carotene [color]), eggs, invert sugar, water, soybean oil, contains 2% or less of: mono- and diglycerides, leavening (baking soda, sodium aluminum phosphate), salt, potassium chloride, natural flavor, turmeric and annatto (color). Contains wheat, milk, eggs, soy.

4

Wheat

Eggs

Milk

Soy (in natural flavor)

Food Allergy Research & Education (FARE) Resource

Understanding Food Labels English and Spanish

Understanding Food Labels



The only way to prevent a serious allergic reaction is to avoid the food allergen.

Reading every food label, every time is one of the best ways to keep you or your loved one safe. Many people who are managing food allergies use the "Rule of 3" for reading ingredient labels—read the label at the store, when unloading your groceries, and before serving the food—to triple-check that a food is safe. Others use a system of colored stickers on foods in the pantry or refrigerator to indicate that an adult has read the ingredient label and determined whether the food is safe or contains the allergen.

There are a variety of approaches that can work, and laws like the Food Allergy Labeling and Consumer Protection Act (FALCPA) help make it easier to understand food labels so that you can safely manage your or your child's food allergies.

What is FALCPA?

This law requires that food labels show in plain English when a "major food allergen" or any ingredient that contains protein from a major food allergen is added as an ingredient in that product.

What foods have to be labeled?

Imported (when sold in the United States) or domestic (made in the United States) pre-packaged foods are required to have a label that lists the major food allergens when they are intentionally added as an ingredient, or when any ingredient contains protein from one of the major food allergens.

Which foods are considered major food allergens under FALCPA?

The U.S. Food and Drug Administration (FDA) considers the following foods major food allergens: milk, wheat, egg, peanuts, tree nuts, fish, crustacean shellfish, and soy. These foods account for 90 percent of food allergy reactions in the United States.



foodallergy.org 6/2020

How do the labels show the major food allergens?

Manufacturers have two options to indicate a major food allergen on product labels. The first option is to list the allergen in parentheses after the ingredient. The second option is to list the allergen at the end of the ingredient list. Often this "Contains" statement is bolded. See the box below for examples of these two options.

Example 1:

Ingredients: Whey protein (milk), lecithin (soy), cherry, sugar, natural flavors (almond), salt.

Example 2:

Ingredients: Whey protein, lecithin, cherry, sugar, natural flavors, salt.
Contains: Milk, soy, and almond.

Does the label have to include the "Contains" statement at the end with the major allergens bolded?

No. The "Contains" statement is one of two options that food manufacturers have for listing the presence of major food allergens.

Should we avoid products with precautionary warnings (e.g., May contain...)?

Most allergists recommend avoiding these products. Studies have shown that some of the products actually do contain allergens in amounts significant enough to cause an allergic reaction.

<https://www.foodallergy.org/resources/how-read-food-label>

Connecticut State Department of Education • Revised April 2022

FARE Resource

Tips for Avoiding Your Allergen

English and Spanish

Tips for Avoiding Your Allergen



- All FDA-regulated manufactured food products that contain a "major food allergen" (milk, wheat, egg, peanuts, tree nuts, fish, crustacean shellfish, and soy) as an ingredient are required by U.S. law to list that allergen on the product label. For tree nuts, fish and crustacean shellfish, the specific type of nut or fish must be listed.
- Read all product labels carefully before purchasing and consuming any item.
- Be aware of unexpected sources of allergens, such as the ingredients listed below.
- *Note: This list does not imply that the allergen is always present in these foods; it is intended to serve as a reminder to always read the label and ask questions about ingredients.

For a Milk-Free Diet

Avoid foods that contain milk or any of these ingredients:

butter, butter fat, butter oil, butter acid, butter extracts
 buttermilk
 cream
 cream hydrolyzate
 creamer (in all forms)
 cheese
 cottage cheese
 cream
 curd
 cultured
 Dannon
 ghee
 half-and-half
 lactalbumin, lactalbumin phosphate, lactulose
 lactose
 lactulose
 milk in all forms, including condensed, sterilized, dry, evaporated, goat's milk, and milk from other animals, butters, melted, sweetened, powder, protein, skimmed, whole, whole
 milk protein hydrolyzate
 pudding
 Rice-A-Roni
 natural cream
 sour cream, sour cream solids
 sour milk solids
 buttermilk
 whey (in all forms)
 whey protein hydrolyzate
 yogurt

Avoid foods that contain milk or any of these ingredients:

artificial butter flavor
 baked goods
 caramel candies
 chocolate
 hydro and starter culture and other bacterial cultures

Keep the following in mind:

- Individuals who are allergic to cow's milk are often advised to also avoid milk from other domestic animals. For example, goat's milk protein is similar to cow's milk protein and may, therefore, cause a reaction in individuals who have a milk allergy.

For a Wheat-Free Diet

Avoid foods that contain wheat or any of these ingredients:

bread crumbs
 bulgur
 cereal extract
 club wheat
 couscous
 cracker meal
 durum
 einkorn
 emmer
 farro
 flour (all purposes, bread, cake, durum, enriched, graham, high gluten, high protein, instant, pastry, self-rising, soft wheat, steel ground, stone ground, whole wheat)
 farro
 hydrolyzed wheat
 protein
 kamut
 malted wheat (also spelled as malted, malted, or malts)
 pasta
 semolina
 spelt
 sprouted wheat
 triticale
 vital wheat gluten
 wheat (durum, durum, green, gluten, green, malt, sprouts, starch)
 wheat bran hydrolyzate
 wheat germ oil
 wheat grass
 wheat protein isolate
 whole wheat berries

Wheat is sometimes found in the following:

glucose syrup
 oats
 soy sauce
 starch (gelatinized starch, modified starch, modified food starch, vegetable starch)
 sorbitol

For an Egg-Free Diet

Avoid foods that contain eggs or any of these ingredients:

albumin (also spelled albumen)
 egg dried, powdered, whole, white, yolk
 egg yolk
 graham
 lecithin
 meringue
 meringue powder
 surimi
 white
 words starting with "ovo" or "ova" (such as omelette)

Egg is sometimes found in the following:

baked goods
 breaded items
 duck, hen, leghorn, specialty (soft)
 egg substitute
 fried rice
 hot sauce
 lecithin
 meringue
 mayonnaise
 meatloaf or meatballs
 nougat
 pasta

Keep the following in mind:

- Individuals with egg allergy should also avoid eggs from duck, turkey, guinea, quail, etc., as these are known to be cross-reactive with chicken egg.
- While the whites of an egg contain the allergenic proteins, pastas with an egg allergy must avoid all eggs completely.

For a Soy-Free Diet

Avoid foods that contain soy or any of these ingredients:

edamame
 miso
 natto
 soy (any amount), soy cheese, soy flour, soy flour, soy grits, soy ice cream, soy milk, soy nuts, soy sprouts, soy yogurt
 soy
 soybean (oil, granules)
 soy protein (concentrate, hydrolyzed, isolate)
 tofu
 soy sauce
 teriyaki
 tempeh
 textured vegetable protein (TVP)
 tofu
 vegetable broth
 vegetable gum
 vegetable starch

Soy is sometimes found in the following:

- The FDA exempts highly refined soybean oil from being labeled as an allergen. Studies show most allergic individuals can safely eat soy oil that has been highly refined (not cold pressed, expeller pressed, or extruded soybean oil).
- Most individuals allergic to soy can safely eat soy lecithin.
- Follow your doctor's advice regarding these ingredients.

<https://www.foodallergy.org/living-food-allergies/food-allergy-essentials/common-allergens/tips-avoiding-your-allergen>

Institute of Child Nutrition (ICN) Resource

Food Allergy Fact Sheets

- Egg Allergies Fact Sheet
- Fish Allergies Fact Sheet
- Milk Allergies Fact Sheet
- Peanut Allergies Fact Sheet
- Tree Nut Allergies Fact Sheet
- Shellfish Fact Sheet
- Soy Fact Sheet
- Wheat Fact Sheet

FOOD ALLERGY FACT SHEET

Peanut Allergies

Why should special precautions be taken with peanut allergies?
Peanuts are one of the most dangerous allergies because peanuts tend to cause particularly severe reactions. Peanut allergies account for the largest number of allergy-related deaths and the greatest incidence of anaphylaxis (a serious allergic reaction that can cause death). For some individuals, even small amounts of peanuts can cause a severe reaction. Non-ingestion contact (such as touching peanuts or inhaling peanut particles) is less likely to trigger severe reactions compared with ingestion. Even so, extreme caution should always be used because proximity to peanuts increases the opportunity for ingestion.

The prevalence of peanut allergies in American children tripled from 1997 to 2008. Still, approximately 20-25% of children with a peanut allergy do outgrow it.

What are the symptoms?
The most common symptoms of an allergic reaction to peanuts include:

- Eczema
- Hives
- Asthma
- Runny nose
- Digestive symptoms
- Anaphylaxis

What foods contain peanuts?
There are many unexpected sources of peanuts so reading food labels is important to eliminate exposure to peanuts. Peanuts are often found in prepared products and in ethnic cuisines, African, Chinese, Indonesian, Mexican, Thai, Vietnamese. Artificial nuts can be peanuts that have been decaffeinated and re-flavored with pecan, almond. Mandelonas are peanuts soaked in almond flavoring.

Many items may not contain peanuts but may be produced in a facility where peanuts are processed or used as an ingredient. As a result, cross contact

FOOD ALLERGY FACT SHEET

Milk Allergies

What age group is most likely to have a milk allergy?
Two to five percent of children under the age of three have a milk allergy, and cow's milk allergy is the most common cause of allergic reactions in young children. This allergy is usually outgrown in the first few years of life, so it is more common in infants and young children than in adults.

Many proteins in milk can cause an allergic reaction. There are two main categories of proteins in milk:

1. Casein—proteins found in the solid part or curd (part of milk that curdles)
2. Whey—proteins found in the liquid part of milk (what remains after milk curdles)

What are the symptoms?
Milk allergies can cause a range of symptoms that occur within a few minutes to a few hours after exposure. Milk rarely causes anaphylaxis, which is a life-threatening allergic reaction.

Immediate symptoms of a milk allergy might include:


- Hives (urticaria)
- Wheezing
- Vomiting

Symptoms that may take more time to develop include:

- Loose stools, which may contain blood
- Diarrhea
- Abdominal cramps
- Coughing or wheezing
- Runny nose
- Watery eyes
- Itchy skin rash, often around the mouth
- Colic in babies

What foods contain milk?
Individuals with a milk allergy need to follow a completely milk-free diet to avoid possible reactions. Eliminating fluid milk and other dairy products such as cheese from the diet is obvious, but many non-dairy products and processed foods contain casein and whey (the proteins in milk). Reading food labels is important to eliminate exposure to ingredients that contain milk. Below is a list of products that contain milk and should be avoided.

- Butter
- Cheese (all types)
- Cottage cheese
- Cream
- Cream cheese
- Curds
- Custard
- Half and half
- Ice cream
- Margarine
- Milk
- Nougat
- Pudding
- Sour cream
- Yogurt



National Food Service Management Institute • The University of Mississippi • 2014

USDA

<https://theicn.org/icn-resources-a-z/food-allergy-fact-sheets>

ICN Resource

Online Training: Food Allergies in School Nutrition Programs, Part 2: Reading Food Labels



Food Allergies in SNPs – Reading Food Labels

ID: E-D19N41

- Duration: 1h - ★★★★★

ABOUT THIS COURSE

CONTENT

ADDITIONAL INFORMATION

This course is part two of a four-part series designed to give you tips and tools for preparing and serving safe food for children with food allergies. Part two discusses reading labels for food allergens.

Intended Audience: School Nutrition Managers, School Nutrition Directors,
School Nutrition Employees/Staff, Chefs

Hours of Instruction: 1

Key Area: 2

Professional Standards Code(s): 2600

<https://theicn.docebos.com/learn/course/external/view/elearning/126/food-allergies-in-snps-reading-food-labels>

Four Key Actions for CACFP Staff

3

Prevent Cross-contact



Terms to Know

Cross-contamination

Transfer of **microorganisms** from a food, person, or surface to another food

- Can cause *foodborne illness*

Cross-contact

Transfer of **allergen** from one food to another food or surface

- Can cause *allergic reaction*

Effect of Cooking



- Destroys most microorganisms

BUT

- Does *not* destroy food allergens (proteins)

CACFP facilities must prevent cross-contact

Example of Cross-contact

- Using same spatula for peanut butter cookies and chocolate chip cookies



Example of Cross-contact

- Using a knife to make peanut butter sandwiches, wiping the knife, then using that same knife to cut a grilled cheese sandwich



Knowledge Check: Is this cross-contact?

Touching almonds then
handling pasta without proper
handwashing

Yes No



Knowledge Check: Is this cross-contact?

Touching almonds then
handling pasta without proper
handwashing

Yes No



Knowledge Check: Is this cross-contact?

Preparing different kinds of sandwiches on the same countertop

Yes No



Knowledge Check: Is this cross-contact?

Preparing different kinds of sandwiches on the same countertop

Yes No



Knowledge Check: Is this cross-contact?

Steam from cooking fish or shellfish touches nearby foods

Yes No



Knowledge Check: Is this cross-contact?

Steam from cooking fish or shellfish touches nearby foods

Yes No



Knowledge Check: Is this cross-contact?

Using the same spatula to flip a Yes No
hamburger after a cheeseburger



Knowledge Check: Is this cross-contact?

Using the same spatula to flip a Yes No
hamburger after a cheeseburger



Knowledge Check: Is this cross-contact?

Cutting cheese then vegetables Yes No
on the same cutting board
without proper cleaning



Knowledge Check: Is this cross-contact?

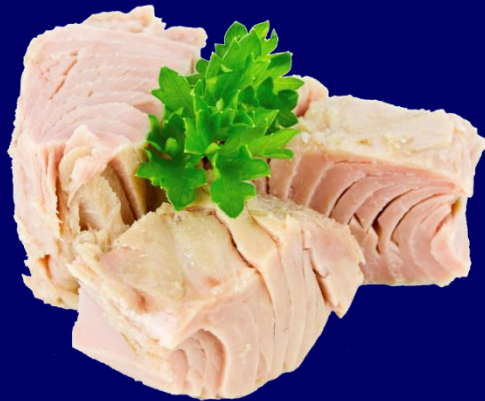
Cutting cheese then vegetables Yes No
on the same cutting board
without proper cleaning



Knowledge Check: Is this cross-contact?

Cooking fish and chicken on
the same flat-top grill or in
the same pan

Yes No



Knowledge Check: Is this cross-contact?

Cooking fish and chicken on
the same flat-top grill or in
the same pan

Yes No



Knowledge Check: Is this cross-contact?

Dipping a knife used to spread peanut butter into a jelly jar Yes No



Knowledge Check: Is this cross-contact?

Dipping a knife used to spread
peanut butter into a jelly jar

Yes No



Knowledge Check: Is this cross-contact?

Milk leaking onto margarine
stored on the shelf below

Yes No



Knowledge Check: Is this cross-contact?

Milk leaking onto margarine
stored on the shelf below

Yes No



Preventing Cross-contact: Handwashing

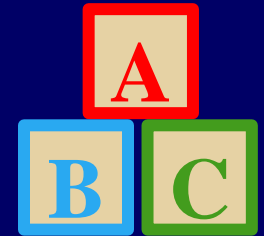
- Use *proper handwashing* during food preparation and service
- Encourage participants and staff to wash hands before and after handling or consuming food
- Use single-use gloves



Proper Handwashing Steps



1. Wet hands with clean running water and apply soap
2. Rub hands together, scrubbing backs of hands, between fingers, and under nails for *20 seconds*
 - Amount of time to sing “ABC” song
3. Rinse hands under running water
4. Dry hands using a clean towel, or air dry





Not Effective in Removing Allergens

- Alcohol-based hand sanitizers or antibacterial gels *
- Handwashing with water alone *

* Does **not** deactivate the proteins that cause food allergy

Preventing Cross-contact: Cleaning

- Properly *clean and sanitize* all work surfaces between uses
 - Surface areas, counters, and cutting surfaces
 - Equipment and utensils
 - Pots and pans
- Use hot soapy water or all-purpose cleaning agents



Follow Proper Cleaning Procedures



- Cleaning with soap, warm water, and friction removes allergen residue

BUT

- Sanitizing to reduce microorganisms does *not* remove allergen residue

Follow Proper Cleaning Procedures



Example: After slicing cheese, clean the slicer thoroughly before slicing other foods

- Cheese protein on the slicer can contaminate the next food sliced



Follow Proper Cleaning Procedures



Example: Wash trays or sheet pans after each use even if using liners

- Oils can seep through liners and contaminate the next food cooked on the sheet pan or put on the tray



Preventing Cross-contact: Handling and Storage

- Proper *handling and storage* of food
 - Prepare food items that do not contain allergens first
 - Label and store allergen-free items separately (color coding)



Preventing Cross-contact: Handling and Storage

- Designate *allergen-safe* food preparation area
- Use *separate pans and utensils* during food preparation and service
 - Color-coded cutting boards and utensils
 - Use clean potholders, oven mitts, and aprons








FARE Resource

Prevent Cross-Contact English and Spanish

Prevent Cross-Contact

Keep diners with food allergies safe. Even a tiny amount of an allergen can cause a severe and potentially life-threatening allergic reaction.

Cross-Contact	Cross-Contamination
Occurs when an allergen is unintentionally transferred from one food to another	Occurs when microorganisms like bacteria contaminate food
Can cause food allergy reactions	Can cause foodborne illnesses
Proper cooking does NOT reduce or eliminate the chances of a food allergy reaction	Proper cooking may reduce or eliminate the chances of foodborne illness

-  Always wash hands and change gloves between preparing different menu items
-  Clean and sanitize surfaces between every menu item: countertops, cutting boards, flat-top grills, etc.
-  Always use clean kitchen tools for food preparation: pots, baking sheets, utensils, cutting boards, etc.
-  Prepare meals on top of barriers like cutting boards, foil, deli paper, etc.
-  **Remember:** If a mistake is made, you must start over and remake the allergy-friendly meal

Proper Cleaning to Remove Allergens



Wash with warm, soapy water



Rinse with clean water



Dry with a fresh cloth



Top 8 Allergens

But over 170 foods have caused food allergy reactions

www.foodallergy.org

©2018, Food Allergy Research & Education (FARE)



<https://www.foodallergy.org/resources/avoiding-cross-contact>

FARE Resource

How to Avoid Cross-Contact English and Spanish

How to Avoid Cross-Contact



What is cross-contact?

Cross-contact happens when one food comes into contact with another food and their proteins mix. As a result, each food then contains small amounts of the other food. These amounts are so small that they usually can't be seen.

Even this tiny amount of food protein has caused reactions in people with food allergies!

The term "cross-contact" is fairly new. Some people may call this "cross-contamination."

Why don't we use the term cross-contamination?

Cross-contamination usually refers to bacteria or viruses that get on food and make it unsafe to eat. In cross-contamination, cooking the food will lower the chance of a person getting sick.

This is not the same with food allergies and cross-contact. Cooking does not remove an allergen from a food!

The only way to stop you from having a reaction is to avoid the food and carefully clean anything that came in contact with it using soap and water.

Examples of cross-contact	
Direct Cross-Contact (allergen was directly applied and then removed)	Indirect Cross-Contact (allergen was not directly applied)
Peeling cheese off a cheeseburger to make it a hamburger	Using the same spatula that flipped a cheeseburger to flip a hamburger
Removing shrimp from a salad	Not washing hands after handling shrimp before making the next salad
Scraping peanut butter off a piece of bread and using it to make a different sandwich	Wiping off—not properly cleaning—a knife used to spread peanut butter before using it to spread jelly

Tips to avoid cross-contact

- Use utensils, cutting boards and pans that have been thoroughly washed with soap and water. Consider using separate utensils and dishes for making and serving safe foods. Some families choose a different color to identify the safe kitchen tools.
- If you are making several foods, cook the allergy-safe foods first.
- Keep the safe foods covered and away from other foods that may splatter.
- If you make a mistake, you can't just remove an allergen from a meal. Even a small amount of cross-contact makes a food unsafe.
- Wash your hands with soap and water before touching anything else if you have handled a food allergen. Soap and water or commercial wipes will remove a food allergen. Sanitizing gels or water alone will not remove an allergen.
- Scrub down counters and tables with soap and water after making meals.
- Do not share food, drinks or utensils. Teach children not to share these when they are at school or with friends.

Standard Operating Procedures (SOPs)

- Cleaning and Sanitizing Food Contact Surfaces
- Preventing Cross Contamination During Storage and Preparation
- Washing Hands
- Serving Safe Food to Students with Food Allergies

HACCP-Based SOPs

Cleaning and Sanitizing Food Contact Surfaces (Sample SOP)

PURPOSE: To prevent foodborne illness by ensuring that all food contact surfaces are properly cleaned and sanitized.

SCOPE: This procedure applies to school nutrition employees involved in cleaning and sanitizing food contact surfaces.

KEY WORDS: Food Contact Surface, Cleaning, Sanitizing

INSTRUCTIONS:

1. Train school nutrition employees on using the procedures in this SOP.
2. Follow state or local health department requirements.
3. Follow manufacturer's instructions regarding the use and maintenance of equipment and use of chemicals for cleaning and sanitizing food contact surfaces. Refer to Storing and Using Poisonous or Toxic Chemicals SOP.
4. If state or local requirements are based on the FDA Food Code, wash, rinse, and sanitize food contact surfaces of sinks, tables, equipment, utensils, thermometers, carts, and equipment:
 - Before each use.
 - Between uses when preparing different types of raw animal foods, such as eggs, fish, meat, and poultry.
 - Between uses when preparing ready-to-eat foods and raw animal foods, such as eggs, fish, meat, and poultry.
 - Any time contamination occurs or is suspected.
5. Wash, rinse, and sanitize food contact surfaces of sinks, tables, equipment, utensils, thermometers, carts, and equipment using the following procedure:
 - Wash surface with detergent solution.
 - Rinse surface with clean water.
 - Sanitize surface using a sanitizing solution mixed at a concentration specified on the manufacturer's label.
 - Place wet items in a manner to allow air drying.
6. If a 3-compartment sink is used, setup and use the sink in the following manner:
 - In the first compartment, wash with a clean detergent solution at or above 110 °F or at the temperature specified by the detergent manufacturer.
 - In the second compartment, rinse with clean water.
 - In the third compartment, sanitize with a sanitizing solution mixed at a concentration specified on the manufacturer's label or by immersing in hot water at or above 171 °F for 30 seconds. Test the chemical sanitizer concentration by using an appropriate test kit.



ICN Resource

Online Training: Food Allergies in School Nutrition Programs, Part 3: Avoiding Cross-Contact



Food Allergies in School Nutrition Programs – Avoiding Cross-Contact

ID: E-E04XR0

- Duration: 1h - ★★★★★

ABOUT THIS COURSE

CONTENT

ADDITIONAL INFORMATION

This course is part three of a four-part series designed to give you tips and tools for preparing and serving safe food for children with food allergies. Part three discusses how to avoid cross-contact – the accidental spread of allergens – while storing, preparing, and serving meals to students with food allergies.

Intended Audience: School Nutrition Staff/Employees, School Nutrition Managers, and School Nutrition Directors

Hours of Instruction: 1

Key Area: 2

Professional Standards Code(s): 2600

OSSE DEL Core Knowledge Area: -

<https://theicn.docebosaas.com/learn/course/external/view/elearning/153/food-allergies-in-school-nutrition-programs-avoiding-cross-contact>

Four Key Actions for CACFP Staff

4

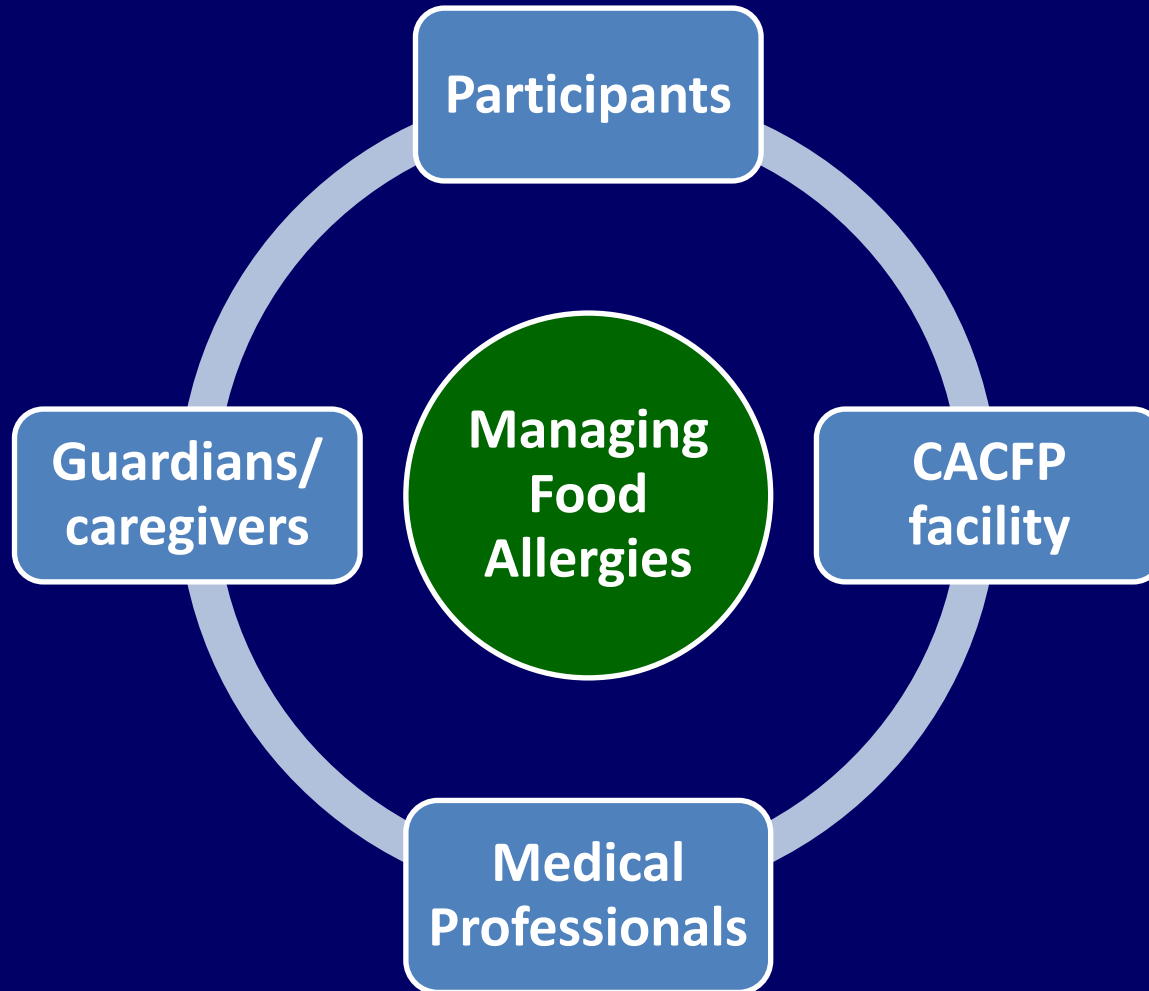
Promote Communication and Teamwork



Good communication is essential for providing a safe environment for participants with food allergies



Inclusive Team Approach



Strategies for Communication: Participant's Diet Plan

- *Understand* what you need to do to follow the participant's medical statement
- *Ask questions* if unsure



Strategies for Communication: Participant's Diet Plan

- Help communicate information to *all food service and adult day care staff* involved with managing a participant's food allergy



Strategies for Communication: Participant's Diet Plan

- Provide *advance copies of menus* for participants and their guardians/caregivers to use in planning
- *Share information* about ingredients in recipes and foods served in CACFP menus



Meal Modifications for Participants without Disabilities





Overview of USDA Requirements

- Meal modifications are *optional*
- Modified meals must always *meet CACFP adult meal patterns*
- Medical statement *not required but recommended* to ensure clear communication



Milk Substitutes for Participants without Disabilities

Two Allowable Milk Substitutes	Requires written request from participant or their guardian/caregiver?
<p>1. <i>Lactose-free or lactose-reduced milk</i> (must meet fat content/flavor restrictions)</p> 	No
<p>2. <i>Nondairy milk substitutes</i> that meets USDA's nutrition standards for fluid milk substitutes</p> 	Yes

What Milk Substitutes Are Allowed

Allowed	Not Allowed
<p data-bbox="102 468 639 644">Soy milk (only certain brands)</p> 	<ul data-bbox="703 468 1638 1229" style="list-style-type: none">• Most brands of soy milk• Almond milk• Cashew milk• Rice milk• Oat milk• Other nondairy milk products 

Prohibited Milk Substitutes

- Adult day care centers can *never* offer juice, water, or any other beverages as a milk substitute for participants without a disability, *even if specified on the medical statement*



Summary of Milk Substitutes in the CACFP

Beverage	Allowable?	
	Disability	No Disability
Juice	Yes *	No
Water	Yes *	No
Nutrition supplement beverages, e.g., Ensure and Boost	Yes *	No

* If specified in participant's medical statement

Summary of Milk Substitutes in the CACFP

Beverage	Allowable?	
	Disability	No Disability
Powdered milk beverages	Yes *	No
Lactose-free or lactose-reduced milk that meets fat content and flavor restrictions	Yes *	Yes

* If specified in participant's medical statement

Summary of Milk Substitutes in the CACFP

Beverage	Allowable?	
	Disability	No Disability
Nondairy milk substitutes that <i>meet USDA's nutrition standards</i> , e.g., certain brands of soy milk	Yes *	Yes

* If specified in participant's medical statement

Summary of Milk Substitutes in the CACFP

Beverage	Allowable?	
	Disability	No Disability
Nondairy milk substitutes that <i>do not meet USDA's nutrition standards</i> , e.g., almond milk, rice milk, cashew milk, oat milk, and some brands of soy milk	Yes *	No
* If specified in participant's medical statement		

Allowable Milk Substitutes for Adult Participants without Disabilities in the CACFP

- Summarizes requirements for nondairy milk substitutes
- Indicates how to identify allowable milk substitutes
- List of allowable commercial products

Allowable Milk Substitutes for Adult Participants without Disabilities in the Child and Adult Care Food Program

The requirements in this document apply only to milk substitutes for adult participants whose dietary needs do not constitute a disability. Meal modifications for adult participants whose disability restricts their diet must follow the federal nondiscrimination laws and regulations. For more information, refer to the Connecticut State Department of Education's (CSDE) guide, *Accommodating Special Diets in CACFP Adult Day Care Centers*.



Adult day care centers that participate in the CACFP must follow the U.S. Department of Agriculture's (USDA) requirements for milk substitutes for adult participants without a disability. These requirements apply only to meal modifications for adult participants without a disability who cannot drink milk.

Adult day care centers have the option to make this accommodation by offering one or more allowable fluid milk substitutes for adult participants without a disability. If the center chooses to make allowable milk substitutes available, they must be available for all adult participants when requested by the adult participant or guardian/caregiver. The USDA does not provide additional reimbursement for these substitutions.



Allowable Fluid Milk Substitutes

The USDA allows two types of milk substitutes for children whose dietary needs do not constitute a disability.

1. **Lactose-free or lactose-reduced milk** that is unflavored low-fat (1%), unflavored fat-free milk, or flavored fat free. The USDA recommends that lactose-free or lactose-reduced milk is the first choice for adult participants with lactose intolerance. **Note:** The USDA's *CACFP Best Practices* recommends serving only unflavored nondairy milk substitutes.
2. **Nondairy milk substitutes** that meet the USDA's nutrition standards for fluid milk substitutes (refer to table 1), such as certain brands of soy milk.

Adult day care centers may choose to offer only one milk substitute. If an adult participant decides not to take this option, the adult day care center is not obligated to offer any other milk substitutes.

More Resources



CSDE Resource

Accommodating Special Diets in CACFP Adult Day Care Centers

- Required meal modifications for adult participants with a disability
- Optional meal modifications for adult participants without a disability



CSDE Resource

Operational Memorandum No. 2A-18

Requirements for Meal Modifications in CACFP Adult Day Care Centers



STATE OF CONNECTICUT
DEPARTMENT OF EDUCATION



TO: Child and Adult Care Food Program (CACFP) Adult Day Care Centers
FROM: John D. Frassinelli, Chief *JDF*
Bureau of Health/Nutrition, Family Services and Adult Education
DATE: October 20, 2017
SUBJECT: **Operational Memorandum No. 2A-18**
Requirements for Meal Modifications in CACFP Adult Day Care Centers

On June 22, 2017, the U.S. Department of Agriculture (USDA) issued policy memo [CACFP 14-2017 SFSP 10-2017: Modifications to Accommodate Disabilities in CACFP and SFSP](#). This operational memorandum **significantly changes** the requirements and process for meal modifications for adult participants with disabilities in CACFP adult day care centers.

This operational memorandum provides an overview of the key requirements for meal modifications, including relevant legislation and definitions, and summarizes the Connecticut State Department of Education's (CSDE) special diets implementation resources for CACFP adult day care centers. For detailed guidance, review the CSDE's guide, [Accommodating Special Diets in CACFP Adult Day Care Centers](#).

REVISED RESOURCES

The CSDE has recently revised the following documents to reflect the USDA's policy guidance in CACFP 14-2017 SFSP 10-2017:

- [Accommodating Special Diets in CACFP Adult Day Care Centers](#);
- [Allowable Milk Substitutes for Adults without Disabilities in the CACFP](#);
- [Medical Statement for Meal Modifications in CACFP Adult Day Care Centers](#); and
- [Guidance and Instructions: Medical Statement for Meal Modifications in CACFP Adult Day Care Centers](#) (new resource).

Please discard any old versions of these documents and replace with the revised versions. **CACFP adult day care centers must carefully review these resources to ensure compliance with the USDA requirements for meal modifications for adult participants with disabilities in the CACFP.**

Please note that there is only **one** medical statement for all meal modification requests for adult participants with and without disabilities. This form replaces the previous two forms (medical statement for adult participants with disabilities and medical statement for adult participants without disabilities).


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<https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/Memos/OM2018/OM02A18.pdf>

USDA Resource

USDA Policy Memo CACFP 14-2017 SFSP 10-2017

Modifications to Accommodate Disabilities in CACFP and SFSP



Food and Nutrition Service
Park Office Center
3101 Park Center Drive
Alexandria VA 22302

DATE: June 22, 2017

MEMO CODE: CACFP 14-2017, SFSP 10-2017

SUBJECT: Modifications to Accommodate Disabilities in the Child and Adult Care Food Program and Summer Food Service Program

TO: Regional Directors
Special Nutrition Programs
All Regions

State Directors
Child Nutrition Programs
All States

This memorandum outlines the requirements for Child and Adult Care Food Program (CACFP) institutions and facilities and Summer Food Service Program (SFSP) sponsors (Program operators) to provide reasonable modifications to Program meals or the meal service to accommodate children or adults (participants) with disabilities. This memorandum supersedes FNS Instruction 783-2, Rev. 2. With the release of this memorandum, FNS Instruction 783-2, Rev. 2 has been rescinded.

BACKGROUND

This guidance only addresses modifications required to accommodate disabilities that restrict a participant's diet. Program operators have the option to accommodate special dietary needs that do not constitute a disability, including those related to religious or moral convictions or personal preference. Additional guidance on accommodating special dietary needs and preferences that are not related to a disability will be provided separately.

Program regulations require Program operators to ensure that breakfast, lunch, snack, or milk (meals) offered through the CACFP and SFSP meet the respective meal pattern requirements established in the Program regulations. Federal law and USDA regulations further require Program operators to make reasonable modifications to accommodate participants with disabilities. This includes providing special meals, at no extra charge, to participants with a disability that restricts the participant's diet.

Program operators are required to make substitutions to meals for participants with a disability that restricts participant's diet on a case-by-case basis and only when supported by a written statement from a State licensed healthcare professional.

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<https://www.fns.usda.gov/cn/modifications-accommodate-disabilities-cacfp-and-sfsp>

CSDE Resource

Self-assessment of Adult Day Care Center Practices for Special Diets in the CACFP

Self-assessment of Adult Day Care Center Practices for Special Diets in the Child and Adult Care Food Program

This tool is intended to help adult day care centers that participate in the U.S. Department of Agriculture’s (USDA) Child and Adult Care Food Program (CACFP) assess current practices for meal modifications and identify areas in need of improvement. The federal nondiscrimination laws require reasonable meal modifications for participants whose disability restricts their diet, based on documentation from a recognized medical authority. A recognized medical authority is a state-licensed healthcare professional who is authorized to write medical prescriptions under state law. This includes physicians, physician assistants, doctors of osteopathy, and advanced practice registered nurses. For information on the requirements for meal modifications, refer to the Connecticut State Department of Education’s (CSDE) guide, *Accommodating Special Diets in CACFP Adult Day Care Centers*, and visit the CSDE’s [Special Diets in CACFP Adult Day Care Centers](#) webpage.

For participants whose dietary restrictions are not related to a disability, CACFP adult day care centers may choose to make optional modifications within the CACFP adult meal patterns. For information on the CACFP adult meal patterns, visit the CSDE’s [Meal Patterns for CACFP Adult Day Care Centers](#) webpage and review the CSDE’s guide, *Meal Pattern Requirements for CACFP Adult Day Care Centers*.



Step 1 — Assessment. Check the appropriate box to indicate if each practice is fully implemented, partially implemented, or not implemented by the CACFP adult day care center. Refer to the CACFP adult day care center’s policies, guidelines, and standard operating procedures (SOPs) for special diets and meal modifications. Check “Not known” if additional information is needed to determine whether the CACFP adult day care center implements the practice.

Federal and state requirements	Implementation			
	Full	Partial	None	Not known
1. The CACFP adult day care center complies with the federal requirements for meal modifications, including the USDA CACFP regulations (7 CFR 226), USDA nondiscrimination regulations (7 CFR 15b), Section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act (ADA), and the ADA Amendments Act. For more information, refer to section 1 of the CSDE’s guide, <i>Accommodating Special Diets in CACFP Adult Day Care Centers</i> .				
2. The CACFP adult day care center makes reasonable meal modifications for participants whose disability restricts their diet, based on the medical statement signed by a recognized medical authority. The medical statement identifies: 1) how the participant’s physical or mental impairment restricts the participant’s diet; 2) an explanation of what must be done to accommodate the participant; and 3) the food or foods to be omitted and recommended alternatives, if appropriate. Note: The CSDE’s form, <i>Medical Statement for Meal Modifications in CACFP Adult Day Care Centers</i> , is available in English and Spanish in the “Documents/Forms” section of the CSDE’s Special Diets in CACFP Adult Day Care Centers webpage.				
3. The CACFP adult day care center maintains a medical statement for each participant who requires a meal modification due to a disability.				
4. When identifying participants during the meal service who require modified meals and snacks due to a disability, the CACFP adult day care center implements policies and practices that protect the privacy of participants and maintain the confidentiality of each participant’s medical condition. For more information, refer to “Identifying Participants” in section 2 of the CSDE’s guide, <i>Accommodating Special Diets in CACFP Adult Day Care Centers</i> .				

https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/SpecDiet/Assessment_Special_Diets_CACFP_Adults.pdf

CSDE Webpage

Special Diets in CACFP Adult Day Care Centers

The screenshot shows the official website of the Connecticut State Department of Education (CSDE). The page title is "Special Diets in CACFP Adult Day Care Centers". The breadcrumb trail indicates the path: CT.gov Home / Department of Education / Special Diets in CACFP Adult Day Care Centers. The page features a navigation menu on the left with links for Overview, What's Next, Documents/Forms, Laws/Regulations, and Contact. The main content area includes an "Overview" section with a sub-menu: CACFP | Adult Day Care Centers | Program Guidance | Forms | Operational Memos | Resources. The text explains that the CSDE guide, "Accommodating Special Diets in CACFP Adult Day Care Centers", provides guidance on meal modifications for CACFP adult participants with special dietary needs, based on federal nondiscrimination laws and U.S. Department of Agriculture (USDA) regulations. A blue box highlights two categories: "Participants with a Disability" and "Participants without a Disability", with sub-links for "Guidance and Resources" and "Developing Policy and SOPs for Meal Modifications". The "Participants with a Disability" section states that the USDA requires reasonable meal modifications on a case-by-case basis for adult participants whose disability restricts their diet, based on a medical statement signed by a recognized medical authority. "Case-by-case basis" means that the meal modifications are specific to the individual medical condition and dietary needs of each adult participant. The Connecticut State Department of Public Health defines a recognized medical authority as a state-licensed health care professional who is authorized to write medical prescriptions under state law. This includes licensed physicians (doctors of medicine or osteopathy), physician assistants, and advanced practice registered nurses (APRN). The "Participants without a Disability" section states that the USDA allows, but does not require, meal modifications for adult participants whose special dietary needs do not constitute a disability. Examples of optional modifications include requests related to religious or moral convictions, general health concerns, and personal food preferences, such as adult participants who prefer a gluten-free diet or organic foods because they believe it is healthier. CACFP adult day care centers may choose to make these accommodations on a case-by-case basis. Meal modifications for adult participants without disabilities must comply with the CACFP adult meal patterns.

<https://portal.ct.gov/SDE/Nutrition/Special-Diets-in-CACFP-Adult-Day-Care-Centers>

Questions?

Contact the CSDE's CACFP staff



<https://portal.ct.gov/SDE/Nutrition/CACFP-Contact>

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, disability, age, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotape, American Sign Language, etc.), should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, (AD-3027) found online at: <https://www.usda.gov/oascr/how-to-file-a-program-discrimination-complaint>, and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

- (1) mail: U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410;**
- (2) fax: (202) 690-7442; or**
- (3) email: program.intake@usda.gov.**

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Inquiries regarding the Connecticut State Department of Education's nondiscrimination policies should be directed to: Levy Gillespie, Equal Employment Opportunity Director/Americans with Disabilities Coordinator (ADA), Connecticut State Department of Education, 450 Columbus Boulevard, Suite 505, Hartford, CT 06103, 860-807-2071, levy.gillespie@ct.gov.